

### **REMARKS/ARGUMENTS**

Reconsideration of the subject application is respectfully requested.

The specification has been amended to set forth a claim of benefit of priority, as has previously been confirmed by the USPTO in the Official Filing Receipt, mailed Sep. 12, 2007, page 1. It is respectfully submitted that, in accordance with MPEP 201.11(III)(D), no petition or surcharge fee is required in order to make such benefit claim.

Claims 1-8 are pending in the subject application, Claim 1 is an independent claim.

Claim 1 has been amended to more clearly provide an antecedent for the "circuit arrangement" recited in the first "wherein" clause of the claim.

### **Rejection under 35 U.S.C. 102(e) – Song – US 2004/0257476**

The Examiner has rejected claims 1-8 under 35 U.S.C. 102(e) as being anticipated by Song et al.

Applicant respectfully traverses this rejection for at least the following reasons.

Regarding claim 1, the Examiner has indicated, *inter alia*, that

As per claim 1, Song discloses an arrangement for generating a pull-down switch-off signal for a video compression encoder, which signal is determined by the arrangement in dependence on a converted signal which is produced from an NTSC signal by means of an inverse 3:2 pull-down conversion, wherein the circuit . . . .

(Emphasis added.)

As explained at page 1, line 28 to page 2, line 4, of the subject specification, an "inverse 3:2 pull-down conversion" relates to an operation which may be conducted upon a signal which has been subjected to a 3:2 pull-down conversion. Thus, it is respectfully submitted that in pending claim 1, the "converted signal" involves a signal which is has been produced using "an inverse 3:2 pull-down conversion." It is this "converted signal" which is then operated upon by the recited Mean Absolute Distortion detector and the circuit for determining Hadamard coefficients.

In contrast, the Song reference, for example at paragraphs [0008] and [0012], makes clear that the technique described in Song is performed on the input video signal, before any further processing is performed in the input video signal. Thus, it is respectfully submitted that Song discloses techniques which are intended to be applied before any "inverse 3:2 pull-down conversion" occurs. On the other hand, pending claim 1 recites that circuit arrangement operate on a "converted signal" which has been "produced from an NTSC signal by means of an inverse 3:2 pull-down conversion." It is therefore respectfully submitted that Song does not teach, suggest, or make obvious the circuit operation recited in claim 1 on a "converted signal" which has been "produced from an NTSC signal by means of an inverse 3:2 pull-down conversion.

It is further noted, and the Examiner has acknowledged, that the teaching relied upon by the Examiner in Song involves "SAD" – described at paragraph [0009] of Song as "Sum of Absolute Difference" patterns – and not a "Mean Absolute Distortion detector", as recited in claim 1. From its very name, a MAD detector suggests a different operation than that of SAD processing. Although the Examiner has asserted that SAD "is commonly used in the art similar to MAD values" the Examiner has not provided any support for such assertion.

It is also respectfully submitted that Song does not teach, suggest, or make obvious, the determining of Hadamard coefficients in which "a first coefficient indicates the sum of the differences of the pixels of adjacent scanning lines  $i$  and  $i+1$  and a second coefficient indicates the sum of the differences of the pixels of scanning lines  $i$  and  $i+2$ " as recited in claim 1. Although the Examiner cites paragraphs 0022-0023 and 0025 of Song as teaching such feature, an examination of those paragraphs indicate a processing on a field by field basis – "W fields" – and not a scanning line versus scanning line basis.

For at least the foregoing reasons it is respectfully submitted that Song does not teach, suggest or make obvious the circuit arrangement of claim 1, and that of claims 2-8 which depend from claim 1.

There are additional features in the dependent claims which further distinguish them over Song, however, it is respectfully submitted that the reasons described above clearly set

forth patentable differences between pending claims 1 through 8 compared with the teachings of Song.

**CONCLUSION**

For the foregoing reasons it is respectfully submitted that the subject application is in condition for allowance, and the Examiner's indication to that end is respectfully solicited.

The Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment to Deposit Account No. 07-1896 referencing our Docket No. 348162-982850.

Respectfully submitted,

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